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SENT VIA EMAIL

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Impact Assessment Agency of Canada
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Attention: Debra Myles, Senior Advisor, Strategic and Regional Assessments

RE: Request by Salish Sea Indigenous Guardians Association (SSIGA) for a Regional Assessment (RA) in the Salish Sea

Dear Debra,

Thank you for the opportunity to respond to the request made to the Impact Assessment Agency of Canada (IAAC) by SSIGA for an RA on the Salish Sea under the *Impact Assessment Act*.

The B.C. Environmental Assessment Office (EAO) supports the concept of an RA and believes that an RA could be beneficial in informing environmental assessments of proposed projects that may have impacts on the Salish Sea. However, the EAO is of the view that there is a need to more fully engage with other provincial Ministries in the natural resources sector who have regulatory responsibilities connected to the Salish Sea, as well as with federal agencies to develop a full understanding of related federal initiatives and how those intersect with provincial initiatives. The EAO is of the view that this outstanding work would need to be addressed before a decision could be made about proceeding with an RA.

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I would however, like to take the opportunity, to outline some of the potential benefits of an RA from the perspective of the EAO that warrant consideration going forward.

Although there are multiple programs underway to evaluate cumulative effects in the Salish Sea that involve governmental agencies, Indigenous nations and other organizations, the EAO is not aware of an overarching strategy to identify, compile and integrate the information that is being collected. A coordinated approach to collecting and managing information on cumulative effects, which is something that an RA could provide with respect to specific Valued Components, has been identified by multiple parties as a potential strategy to address this need.

As you may be aware, there are several projects in the region, either undergoing assessment or that have been recently approved, that are/were required to conduct a cumulative effects assessment. These include Tilbury Marine Jetty, Tilbury Phase 2 LNG Expansion, Roberts Bank Terminal 2, GCT Deltaport Expansion - Berth Four, Delta Grinding Facility and the Fraser River Tunnel Project. In the case of Roberts Bank Terminal 2, the assessment panel recommended that an RA be conducted for the Salish Sea.¹ Additionally, to effectively respond to concerns raised through the environmental assessment process related to cumulative effects and impacts from existing conditions, the availability of a comprehensive set of recommendations for broad mitigation and accommodation measures for projects being assessed under both B.C.'s *Environmental Assessment Act* and Canada's *Impact Assessment Act* would provide significant value.

The EAO has also heard from Indigenous nations on recent EAs that an RA in the Salish Sea region would help provide critical information on cumulative effects, to support Nations' assessments of the potential impacts of proposed projects on their interests and rights as recognized and affirmed by Section 35 of the Constitution Act.

Whether or not the Minister of Environment and Climate Change approves the request for an RA at this time, we would welcome an opportunity to be involved in exploratory discussions with IAAC to more fully understand the related initiatives underway and potential for an RA on the Salish Sea under *the Impact Assessment Act*.

Sincerely,

<original signed by>

Elenore Arend
Chief Executive Assessment Officer and Associate Deputy Minister

¹Roberts Bank Terminal 2 Panel Report, Recommendation 70.